

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS,
DALLAS DIVISION

JOE M. FULBRIGHT,

Plaintiff,

v.

UNION PACIFIC RAILROAD COMPANY,

Defendant.

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Civil Action No: 3:20-cv-02392-BK

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff Joe M. Fulbright moves for summary judgment holding Defendant liable as a matter of law on his first cause of action for disabilities discrimination. Plaintiff also moves for summary judgment on three defenses: failure to mitigate, direct threat, and undue hardship.

The matters required by Local Rule 56.3(a) are set forth in the plaintiff's supporting brief, and an appendix containing the materials supporting this motion and brief is being filed separately.

Respectfully submitted,

/s/ Donald E. Uloth

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CERTIFICATE OF SERVICE

On August 27, 2021, I served a copy of this document to Heather M. Miller, counsel for Defendant, by email to hmiller@constangy.com, and to Robert L. Ortvals, Jr., counsel for Defendant, by email to rortvals@constangy.com.

/s/ Donald E. Uloth

Donald E. Uloth